

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**
Caption in compliance with D.N.J. LBR 9004

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In re:

T.J. MCDERMOTT TRANSPORTATION CO., INC.

Debtor.

Case No. 22-17912 (JNP)

Hon. Jerrold N. Poslusny, Jr.

Chapter 7

**Hearing Date: April 18, 2023 at 11:00
a.m.**

Objection Deadline: April 11, 2023

**NOTICE OF MOTION FOR ENTRY OF AN ORDER
LIFTING THE AUTOMATIC STAY AS TO
WELLS FARGO VENDOR FINANCIAL SERVICES, LLC**

PLEASE TAKE NOTICE that, on April 18, 2023 at 11:00 a.m., or as soon thereafter as counsel may be heard, counsel to Wells Fargo Vendor Financial Services, LLC (“Wells Fargo”), shall move before the Honorable Judge Poslusny, Jr., U.S.B.J., at the United States Bankruptcy Court for the District of New Jersey, 400 Cooper Street, Courtroom No. 4C, Camden, New Jersey, with regard to Motion for Entry of an Order Lifting the Automatic Stay as to Wells Fargo (the “Motion”).

PLEASE TAKE FURTHER NOTICE that Wells Fargo shall rely on the Memorandum of Law, Affidavit of Lisa Boddicker, Certification of Creditor Regarding Post-Petition Payment History and the proposed Order filed simultaneously herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that the Motion shall be provided to (i) the Office of the United States Trustee for the District of New Jersey; (ii) counsel for the Debtor; (iii) the parties requesting notice pursuant to Rule 2002, and (iv) counsel to the Trustee. In light of the nature of the relief requested herein, Wells Fargo submits that no other or further notice is required beyond the notice provisions described in this Motion.

PLEASE TAKE FURTHER NOTICE that Wells Fargo requests that the 14-day stay of an entered Order on the Motion be waived.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2, opposition to the Motion, if any, shall be filed with the Clerk of the Bankruptcy Court and served on counsel to Wells Fargo and all other applicable parties at least seven (7) days before the hearing date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion may be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

Date: March 28, 2023

McCARTER & ENGLISH, LLP
Attorneys for Wells Fargo Vendor Financial Services, LLC

/s/ Sheila E. Calello
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